

**EXHIBIT 1**

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY  
IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA  
AUG 13 2019

TINA M. BROWN,

Plaintiff,

vs.

BALFOUR BEATTY COMMUNITIES, LLC,

Defendant.

RICK WARREN  
COURT CLERK

00. \_\_\_\_\_

Case No.

**CJ-2019-4502**

**PETITION**

Plaintiff, for her Petition against Defendant, states:

1. This Petition is the refiling of a Petition that was originally filed on December 22, 2016, styled identically and given Case No. CJ-2016-6528. This case was dismissed without prejudice on September 27, 2018. This Petition is being re-filed pursuant to the Oklahoma Saving Statute.
2. That Plaintiff began employment with Defendant on March 3, 2014, as an Administrator. At all times, Plaintiff performed her job duties in a satisfactory manner.
3. On July 22, 2016, Plaintiff was terminated by facility manager, Timothy Health.
4. Plaintiff was terminated for reasons that were not disclosed or specified by Defendant.
5. Plaintiff was completing directives given to her by Mr. Health to fraudulently falsify quarterly reports so he could collect monies and bonuses from Corporate. Plaintiff asserts that this is the reason she was terminated.
6. Plaintiff believes she was wrongfully terminated. Specifically, Defendant terminated Plaintiff once an investigation was started regarding the falsified

reports. Defendant made Plaintiff a scapegoat when Plaintiff was simply following the orders of her supervisor.

7. Defendant owed a duty to the Plaintiff and breached that duty.
8. That Plaintiff filed an EEOC claim on September 26, 2016.
9. That Plaintiff's EEOC claim was denied on September 26, 2016.
10. That as a result of wrongful termination, Plaintiff, Tina M. Brown, suffered a loss of earnings and a loss of vacation/sick time.
11. By reason of the above and foregoing, the Plaintiff, Tina M. Brown, has been damaged in the sum in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code.

**WHEREFORE**, the Plaintiff, Tina M. Brown, prays for judgment against the Defendant, Balfour Beatty Communities, LLC, and for a total sum in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code, costs of this action and for such other and further relief as the Court deems just and proper.

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ATTORNEY FOR PLAINTIFF

**ATTORNEY LIEN CLAIMED**